

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

Broward County, Florida v. Purdue Pharma L.P., et al., Case No. 18-OP-45332 (N.D. Ohio);

Cabell County Commission, West Virginia v. AmerisourceBergen Drug Corp., et al., Case No. 17-OP-45053 (N.D. Ohio);

City of Cleveland v. AmerisourceBergen Drug Corp., et al., Case No. 18-OP-45132 (N.D. Ohio);

County of Monroe, Michigan v. Purdue Pharma L.P., et al., Case No. 18-OP-4515 (N.D. Ohio);

The City of Chicago, Illinois v. Purdue Pharma L.P., Case No. 17-OP-45169 (N.D. Ohio);

The County of Cuyahoga v. Purdue Pharma L.P., et al., Case No. 17-OP-45004 (N.D. Ohio); and

The County of Summit, Ohio., et al., v. Purdue Pharma L.P., et al., Case No. 18-OP-45090 (N.D. Ohio).

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**PROPOSED ORDER GRANTING
PLAINTIFFS' MOTION FOR LEAVE TO
FILE AMENDED COMPLAINTS UNDER
SEAL**

Plaintiffs seek leave to file Amended Complaints under seal in the following seven (7) cases:

1. *Broward County, Florida v. Purdue Pharma L.P., et al.*, Case No. 18-OP-45332 (N.D. Ohio);
2. *Cabell County Commission, West Virginia v. AmerisourceBergen Drug Corp., et al.*, Case No. 17-OP-45053 (N.D. Ohio);

3. *City of Cleveland v. AmerisourceBergen Drug Corp., et al.*, Case No. 18-OP-45132 (N.D. Ohio);
4. *County of Monroe, Michigan v. Purdue Pharma L.P., et al.*, Case No. 18-OP-4515 (N.D. Ohio);
5. *The City of Chicago, Illinois v. Purdue Pharma L.P.*, Case No. 17-OP-45169 (N.D. Ohio);
6. *The County of Cuyahoga v. Purdue Pharma L.P., et al.*, Case No. 17-OP-45004 (N.D. Ohio); and
7. *The County of Summit, Ohio., et al., v. Purdue Pharma L.P., et al.*, Case No. 18-OP-45090 (N.D. Ohio).

The Motion states that filing said Amended Complaints under seal is necessary to ensure compliance with the following Orders:

1. Case Management Order One, ECF Doc. 232 (hereinafter “CMO One”);
2. Protective Order Re: DEA’s ARCOS/DADS Database, ECF Doc. 167 (hereinafter “ARCOS Protective Order”); and
3. Agreed Qualified Protective Order For Protected Health Information, filed in *City of Chicago v. Purdue Pharma L.P.*, Case No. 14-CV-04361, ECF Doc. 386 (N.D. Ill.) (hereinafter “City of Chicago Protective Order”).

The Motion states that said Amended Complaints will contain information that is subject to Protective Orders. Specifically, the Amended Complaints will contain:

1. Information designated CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER by the ARCOS Protective Order; and
2. Excerpts from documents produced in *The City of Chicago, Illinois v. Purdue Pharma L.P.*, Case No. 14-CV-04361 (N.D. Ill.), which are subject to the City of Chicago Protective Order, which binds Plaintiffs in MDL 2804 pursuant to CMO One.

Plaintiffs’ Motion for Leave to File Amended Complaints Under Seal is hereby

GRANTED.

IT IS SO ORDERED.

DAN AARON POLSTER
UNITED STATES DISTRICT JUDGE

Dated: April 25, 2018